

EXHIBIT D

UNITED STATES DISTRICT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BROKERARTE CAPITAL PARTNERS,
LLC,

Case No.

Honorable

Plaintiff,

v.

THE DETROIT INSTITUTE OF ARTS,

Defendant.

Aaron M. Phelps (P64790)
Neil E. Youngdahl (P82452)
VARNUM LLP
Attorneys for Plaintiff
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**[PROPOSED] ORDER FOR IMMEDIATE POSSESSION PENDING FINAL
JUDGMENT**

The Court having reviewed Plaintiff's Motion for Temporary Restraining Order and Possession Pending Final Judgment and supporting documents and being otherwise duly advised of the facts and circumstances of this case,

NOW, THEREFORE, IT IS ORDERED that Plaintiff is hereby granted possession of the Painting described in Plaintiff's Motion.

IT IS FURTHER ORDERED that Plaintiff shall have the right to enter the place where the Painting is kept to take possession of and/or remove the Painting.

IT IS FURTHER ORDERED that Defendant shall not impede in any manner Plaintiff's right to enter the place where the Painting is kept to remove the Painting.

IT IS FURTHER ORDERED that, in the event Defendants do not comply with this Order, or if Defendant impedes Plaintiff's repossession of the Painting as allowed by this Order, Plaintiff may present this Order to an appropriate law enforcement officer for seizure of the Painting by such Officer, who shall accomplish the repossession of the Painting immediately.

IT IS SO ORDERED.

Dated: January 10, 2023

_____/s/_____

Hon. _____
United States District Court Judge

Respectfully submitted,

VARNUM LLP
Attorneys for Plaintiff

Date: January 10, 2023

By: /s/ Aaron M. Phelps
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